

KAMER ZUCKER ABBOTT
 Jen J. Sarafina #9679
 Nicole A. Martin #13423
 3000 West Charleston Boulevard, Suite 3
 Las Vegas, Nevada 89102-1990
 Tel: (702) 259-8640
 Fax: (702) 259-8646
 jsarafina@kzalaw.com
 nmartin@kzalaw.com

Attorneys for Defendant
 NevadaPure, LLC

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JANE DOE,)	Case No. 2:19-cv-01664-JCM-VCF
)	
Plaintiff,)	
)	
vs.)	<u>STIPULATION AND ORDER TO</u>
)	<u>STAY EARLY NEUTRAL</u>
)	<u>EVALUATION PROCEEDINGS</u>
NEVADAPURE, LLC, a Nevada limited liability)	
company dba SHANGO LAS VEGAS,)	<u>(Second Request)</u>
)	
Defendant.)	
)	

Plaintiff Jane Doe (“Plaintiff”), by and through her counsel, Melanie Hill Law PLLC, and Defendant NevadaPure, LLC dba Shango Las Vegas (“Defendant”), by and through its counsel, Kamer Zucker Abbott, stipulate and request that the Court stay the scheduled Early Neutral Evaluation proceeding which would require in-person interactions that should be avoided at this time due to the COVID-19 pandemic and the declaration of a national emergency and Nevada state of emergency. In support of this Stipulation and Request, the parties state as follows:

1. On February 18, 2020, the Court entered an Order scheduling an Early Neutral Evaluation Session (“ENE”) to be held on April 14, 2020. (ECF No. 12).
2. The parties filed a Stipulation to Continue the ENE on March 12, 2020. (ECF No. 17).
3. The Court granted the Stipulation to Continue the ENE on March 12, 2020, moving the ENE to May 28, 2020. (ECF No. 20).

4. Defendant filed a Motion to Partially Dismiss Plaintiff's Complaint on February 14, 2020. (ECF No. 10). Plaintiff's Opposition to Defendant's Motion to Partially Dismiss was due on March 30, 2020. However, the parties filed a Stipulation and Order to Stay this case until May 29, 2020, based on the potential delay and danger posed by COVID-19. (ECF No 21). This request was granted on April 13, 2020. (ECF No 23).
5. The parties request that the Early Neutral Evaluation currently scheduled for May 28, 2020 be stayed to allow the parties time to engage in further informal discussions.
6. The parties submit this request in compliance with Judge Koppe's April 6, 2020 Minute Order (ECF No 22) requesting that the parties meet-and-confer and stipulate to a continuance, if necessary.
7. This Request is not sought for any improper purpose or other reason of delay.

WHEREFORE, the parties respectfully request that the Court stay Early Neutral Evaluation proceedings in this case until after the stay is lifted in this case. The parties will file a Motion to re-set the ENE within seven (7) days after the Stay is lifted.

DATED this 23rd day of April, 2020

/s/ Melanie A. Hill

Melanie A. Hill #8796
MELANIE HILL LAW PLLC
520 S. 7th Street, Suite A
Las Vegas, Nevada 89101
Tel: (702) 362-8500
Fax: (702) 362-8505

Attorney for Plaintiff
Jane Doe

DATED this 23rd day of April, 2020

/s/ Nicole A. Martin

Jen J. Sarafina #9679
Nicole A. Martin #13423
KAMER ZUCKER ABBOTT
3000 West Charleston Boulevard, Suite 3
Las Vegas, NV 89102
Telephone: (702) 259-8640
Facsimile: (702) 259-8646

Attorneys for Defendant
NevadaPure, LLC

IT IS SO ORDERED.

Dated: April 23, 2020


UNITED STATES MAGISTRATE JUDGE